

REMARKS

Claims 1-15, 17-28, and 31-33 are pending as of the mailing date of this communication that is in response to the Office Action mailed April 13, 2007. Favorable reconsideration is respectfully requested in view of the above amendments and the following remarks.

As a preliminary matter, applicants assume that the reference to previously cited prior art "Berg" (U.S. Patent No. 5,999,911 to Berg et al.) in paragraph 15 of the Office action is a typographical error and that it should be "Homsí" (U.S. Patent No. 7,065,493 to Homsí). This belief is based on the fact that paragraph 10 of the Office action indicates that claims 20-25 and 28 are rejected as anticipated by the Homsí reference. This belief is also based on the fact that paragraph 40 of the Office action indicates that the grounds of rejection are new.

Claims 1-14 are rejected under 35 U.S.C. Sec. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. Applicants have amended claim 1 so that it should no longer be objectionable. Although one preferred embodiment of the invention uses a thin client application to perform step (b) and/or other steps set forth in claim 1, and applicants believe that the use of a thin client application to perform step (b) and/or other steps set forth in claim 1 would not be anticipated by or obvious over the known prior art alone or in combination, applicants believe that additional claimed features make the claims allowable as set forth below and, therefore, do not want to limit the performance of step (b) to being performed only by a thin client application.

Claims 20-25 and 28 are rejected under 35 U.S.C. Sec. 102(e) as being anticipated by U.S. Patent No. 7,065,493 to Homsí, hereinafter referred to as the "Homsí reference." Claims 1, 2, 4, 5, 7-19, 26, 27, and 31-33 are rejected under 35 U.S.C. Sec. 103 as being unpatentable over the Homsí reference in view of U.S. Patent Application No. 2003/0225663 A1 to Horan et al., hereinafter referred to as the "Horan reference." Claims 3 and 6 are rejected under 35 U.S.C. Sec. 103 as being unpatentable over the Homsí reference and the Horan reference, in view of what the Examiner claims was well known prior art at the time of the applicants' invention.

Applicants have amended claims to clarify the invention. Applicants have made these amendments for the purpose of furthering prosecution, but reserve the right to file continuation applications. For the purpose of furthering prosecution, applicants would be pleased

to work with the Examiner to amend the currently pending claims so that they would be allowable or to draft new claims that would be allowable.

The pending claims are directed to methods, systems, and apparatuses for creating a workflow process. As described in previous communications, the methods, systems, and apparatuses feature a centralized system that users access. The methods, systems, and apparatuses allow users, some of whom have no previous computer programming or computer developing skills, to create a custom workflow process. In some preferred embodiments, the methods, systems, and apparatuses allow access to a centralized master center via a thin client application or via web services. In some preferred embodiments, the methods, systems, and apparatuses do not require users to have specialized hardware or software to participate in the creation of the workflow.

The independent claims have been amended to clarify the action objects are defined to have at least one property including at least one form related function for processing said at least one form. Support for this claim language may be found, for example, in the original specification beginning at page 15, line 15: "In defining the properties of the action object icon 455, the system analyst 40 may define form related functions to the action object icon 455." New dependent claims have also been added that specify exemplary form related functions. Support for these new dependent claims may be found, for example, in the original specification beginning at page 15, line 16:

"Form related functions may include, but are not limited to: (i) instructing the action object icon 455 to save data entered into the form 445 in the database server 140, forms server 130 or user interface server 150; (ii) instructing the action object icon 455 to check for combinations of data on the form 445; (iii) initiate emails to an end user 30 based on data entered into the form 445; (iv) generate correspondence to an end user 30 based on data entered into the form 445; or (v) generate audit information."

The amended claims, therefore, specify action objects specifically perform functions related to the forms.

Applicants would like to direct the Examiner's attention to two of the claim elements in particular: "forms" and "action objects."

The claimed “forms” are described in applicants’ original application. For example, beginning at page 15, line 1 “forms” are described as follows: “The forms 445 consist of previously defined data files 425 which have been formatted.” Thus, “forms” are not traditional forms (e.g. documents with blanks to be filled), but a collection of data (defined by a system analyst) that is accessible from the action objects and used to define workflow logic. This is also shown in the claims. For example, in claim 1, “forms” include “at least one data file,” “data files” include “at least one data record,” and “data records” are based on collected data. Applicants would like to mention that the Homs reference may use the terms “form” and “document” interchangeably which complicates this analysis (although applicants are not specifically admitting this because there also appear to be differences). However, at this point it is applicants’ understanding that neither the “form” nor the “document” can be equated to applicants’ claimed “form.” As set forth above, applicants’ claimed “forms” are not traditional forms (e.g. documents with blanks to be filled), but a collection of data that is accessible from the action objects and used to define workflow logic. Applicants’ claimed “forms” include “at least one data file,” “data files” include “at least one data record,” and “data records” are based on collected data. Neither the Homs “form” nor the Homs “document” have this structure.

The claimed “action objects” are described in applicants’ original application. For example, “action objects” are described, for example, beginning at page 12, line 13 as follows: “The action object icons 455 represent properties that determine how a form 445 or forms 445 are treated in a workflow process.” “Action objects” are also described, for example, beginning at page 14, line 28 as follows: “Again, the action object icons 455 represent how the form 445 is treated throughout a workflow process 10.” As can be seen from the definitions (and elsewhere in the specification and claims), action objects can be tied to or bound to data within a defined form. This allows an end user who inputs data during workflow processing to perform actions on the data and/or to control the path of the workflow. Associating the form to an action object (e.g. by using the name of the form) facilitates selection of a specific data record within the specified form from the action object.

The Homs reference does not have a concept of the interaction between the forms and the object icons as set forth in the currently pending independent claims. The Examiner appears to equate the Homs forms discussed at column 4, lines 58-66 with applicants’ claimed

forms. Applicants specifically reject the proposition that they can be equated as the Homsi forms are not groupings of data files (or formatted, previously defined data files). The Examiner appears to equate the Homsi representations of the events and conditions with applicants' claimed object icons. Applicants specifically reject the proposition that they can be equated. For purposes of this analysis only, however, even if the Homsi forms could be equated with applicants' claimed forms and the Homsi representations of the events and conditions could be equated with applicants' claimed object icons, there is still no teaching or suggestion in the Homsi representations of the events and conditions could have defined properties, at least one of which is a form related function for processing forms. As this is an example of a claim limitation now present in applicants' pending independent claims, applicants respectfully submit that the Homsi reference does not teach or suggest the claimed invention, alone or in combination with the other references, of the independent claims or the claims depending thereon.

From applicants' reading of the Homsi reference, it appears that Homsi directly associates a set of workflow with a Lotus Notes form to be completed by a user. How the Lotus Notes form is directly associated with a set of workflow appears to be shown in FIG. 4, where all workflow related to a specific event (e.g. submission of an expense report) will link to data that has been defined within the Lotus Notes form that the users see. Sub-forms can be attached to the form by the analyst, but the sub-forms (conditions and segments) only use the form data for routing of the workflow. And, the formula is within the document being routed, such that the document would have to be evaluated to a "True" or "False" condition to be used by a conditional form.

Using applicants' claimed invention, the organization of the data to be used by the workflow is independent of the user interface (UI) presented to the end user when filling in the data as part of the workflow step. These are the claimed "forms" of the present application. This leads to several differences between applicants' claimed invention and the device taught in the Homsi reference. Examples of the differences include the following:

1. Data defined in the form may or may not be visible to the end user, allowing internal variables to be associated with the form.
2. Any collection of "forms" can be linked to any number of workflow sequences.

3. The system analyst can build expressions in terms of form data (from any defined forms) that can be used to influence the flow of the workflow (conditional action objects), generate data outside of the workflow (e.g. save the result of a calculation to a separate database), or change the value of any form data.

If the rejections to the claims based on the Homs reference are to be maintained, applicants respectfully request that the Examiner show where each of applicants' claim limitations can be found in the Homs reference. Applicants would be particularly interested in the Homs teaching for applicants' claimed "forms" and "action objects."

Applicants have chosen not to present arguments specific to each of the pending claims, but reserve the right to present such arguments in future communications. For the record, however, applicants are specifically not admitting that the Homs elements that have been equated to applicants' claimed elements are equivalent. For example, the Homs router does not appear to be the claimed master center (and there is no request to access a workflow process submitted to the Homs router) as is suggested in the Office action.

Based on the amendments and remarks set forth herein, applicants respectfully submit that the pending claims are now in condition for allowance.

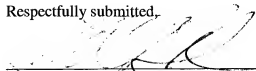
CONCLUSION

Reconsideration of the claims is respectfully requested in view of the above amendments and remarks. In the event that there are any questions concerning this response, or the application in general, the Examiner is respectfully urged to telephone the undersigned attorney so that prosecution of the application may be expedited.

A Petition for Extension of Time for two months is enclosed herewith.

Please charge Deposit Account No. 13-3571 for any additional fees which may be required.

Respectfully submitted,



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